

EXHIBIT A

Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
Tel: 215.963.5000
Fax: 215.963.5001
www.morganlewis.com

Morgan Lewis
COUNSELORS AT LAW

Christina Joy F. Grese
Associate
215.963.5085

April 8, 2008

VIA FIRST CLASS MAIL AND E-MAIL

Jeremy M. Cerutti, Esquire
Karpf, Karpf & Virant
3070 Bristol Pike
Bldg. 2, Ste. 231
Bensalem, PA 19020

Re: Sills v. Educational Commission for Foreign Medical Graduates, C.A. No. 2:07-cv-04637

Dear Mr. Cerutti:

I write regarding Plaintiff's overdue responses to Defendant's First Set of Interrogatories and Defendant's First Request for Production of Documents in the above-referenced action. The purpose of this letter is to address these issues in an attempt to resolve them without involvement of the Court.

As you know, Defendant's discovery requests were served by regular mail and e-mail on February 11, 2008. Accordingly, Plaintiff's responses were due on March 17, 2008. I have since telephoned you and left messages regarding Plaintiff's responses, which are now three (3) weeks overdue. To date, I have received neither Plaintiff's responses nor any communication seeking an extension for such responses. We therefore request that you provide us with Plaintiff's responses immediately. If we do not receive Plaintiff's discovery responses within the next week, we will be forced to submit a motion to compel discovery. If such a motion is required, we will also seek reasonable expenses incurred in making the motion, including attorney's fees.

Very truly yours,

Christina Joy F. Grese

Christina Joy F. Grese



Jeremy M. Cerutti, Esquire

April 8, 2008

Page 2

c: Ari R. Karpf, Esquire
Michael J. Ossip, Esquire

EXHIBIT B



akarpf@karpf-law.com
04/10/2008 07:31 PM

To jgrese@morganlewis.com
cc
bcc
Subject RE: Sills v. ECFMG

History: This message has been forwarded.

Joy,

Sorry about the delay in providing discovery responses in the above matter. We expect our client to drop off the rest of his responsive documents tomorrow to our office. We also anticipate Mr. Sills signing the verification for his Interrogatory Responses by tomorrow at the latest. We anticipate providing discovery responses to you by early next week at the latest.

Again, sorry for the delay.

Very truly yours,

Ari R. Karpf, Esq.

Karpf, Karpf & Virant
Neshaminy Plaza
3070 Bristol Pike
Bldg. 2, Ste. 231
Bensalem, PA 19020
215-639-0801 (P)
215-639-4970 (F)

All information and attachments in this message contain privileged and confidential communication. If the reader of this message is not the intended recipient, or any employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to the message and deleting it from your computer. Thank you.

* * * *

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with Treasury Department regulations, we inform you that any U.S. federal tax advice contained in this correspondence (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed under the U.S. Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

----- Original Message -----

Subject: Sills v. ECFMG

From: jgrese@morganlewis.com
Date: Tue, April 08, 2008 6:30 pm
To: "Jeremy Cerutti" <jeremy@karpf-law.com>
Cc: akarpf@karpf-law.com, mossip@morganlewis.com

Jeremy:

Please see the attached correspondence regarding Plaintiff's discovery responses.

Thanks,

Joy

Joy F. Grese
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103
215.963.5085
Fax: 215.963.5001 or 1.877.432.9652
jgrese@morganlewis.com

DISCLAIMER

This e-mail message is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

IRS CIRCULAR 230 DISCLOSURE

To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or, (ii) promoting, marketing or recommending to another party any transaction matter addressed herein.

DISCLAIMER

This e-mail message is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

EXHIBIT C



"Kristin Sutherland"
<kristin@karpf-law.com>
04/18/2008 11:14 AM

To jgrese@morganlewis.com
cc
bcc
Subject Sills v. Educational Commission for Foreign Medical
Graduates

Dear Ms. Grese,

I am currently trying to obtain a verification from our client so that I may forward his responses. I will try to have these faxed over by the end of the day. If you have any questions please feel free to contact me or Ari.

Thank you.

Very truly yours,

Kristin Sutherland
Paralegal

Karpf, Karpf, & Virant
3070 Bristol Pike
Building 2, Suite 231
Bensalem, PA 19020
Phone: (215) 639-0801 Ext. 108
Fax: (215) 639-4970

EXHIBIT D



akarpf@karpf-law.com

04/22/2008 08:34 AM

To jgrese@morganlewis.com

cc mossip@morganlewis.com, "Jeremy Cerutti"
<jeremy@karpf-law.com>

bcc

Subject RE: Sills v. ECFMG

History:

✉ This message has been replied to.

Joy,

Thank you for your patience with respect to the above case. If Mr. Sills does not contact appear in our Firm by close of business today to authorize this Firm to send his discovery responses, we will promptly file a motion to withdraw from his case this evening.

Very truly yours,

Ari R. Karpf, Esq.

Karpf, Karpf & Virant
Neshaminy Plaza
3070 Bristol Pike
Bldg. 2, Ste. 231
Bensalem, PA 19020
215-639-0801 (P)
215-639-4970 (F)

All information and attachments in this message contain privileged and confidential communication. If the reader of this message is not the intended recipient, or any employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to the message and deleting it from your computer. Thank you.

* * * *

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with Treasury Department regulations, we inform you that any U.S. federal tax advice contained in this correspondence (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed under the U.S. Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RYAN SILLS,	:	
	:	
Plaintiff,	:	Civil Action No. 07-4637
v.	:	
EDUCATIONAL COMMISSION FOR	:	
FOREIGN MEDICAL GRADUATES,	:	
	:	
Defendant.	:	
	:	

PETITION OF PLAINTIFF'S COUNSEL TO WITHDRAW

Plaintiff's undersigned counsel respectfully requests that they be permitted to withdraw from the above-captioned matter for the following reasons:

1. The instant lawsuit was initiated on November 5, 2007 (docket entry # 1).
2. In the instant lawsuit, Plaintiff seeks redress for alleged violations of the Family and Medical Leave Act.
3. A Rule-16 conference was conducted on February 15, 2008 wherein this Court set a fact discovery deadline for June 6, 2008 (docket entry # 9).
4. For a period of more than 2 months, Plaintiff has failed to cooperate with his counsel by refusing to communicate with counsel and by failing to appear at scheduled appointments.
5. Plaintiff has been warned in writing and by telephone message multiple times that his failure to cooperate would result in Plaintiff's undersigned counsel being forced to seek the instant relief.
6. Under the Rules of Professional Conduct 1.16(b)(5), 1.16(b)(6), and 1.16(b)(7), Plaintiff's undersigned counsel should be permitted to withdraw from the instant case.

Case 2:07-cv-04637-JG Document 10 Filed 04/23/2008 Page 3 of 4

KARPF, KARPF & VIRANT

By:

Ari R. Karpf, Esq.

Sean Galvin, Esq.

Attorneys for Plaintiff

3070 Bristol Pike

Building 2, Suite 231

Bensalem, PA 19020

(215) 639-0801 phone

(215) 639-4970 fax

Date: April 23, 2008

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RYAN SILLS,	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 07-4637
	:	
v.	:	
	:	
EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES,	:	
	:	
Defendants.	:	

ORDER

AND NOW, this 13th day of May, 2008, it is hereby ORDERED that Plaintiff Ryan Sills shall SHOW CAUSE at a hearing on June 2, 2008, at 4:00 p.m. in Courtroom 17A, United States Courthouse, why the Petition of his counsel, Ari Karpf and Sean Galvin and the firm of Karpf, Karpf & Virant, for Leave to Withdraw as Legal Counsel (Docket No. 10) should not be granted. It is FURTHER ORDERED that Plaintiff's counsel shall serve the Plaintiff with a copy of this Order via U.S. Mail.

BY THE COURT:

S/ James T. Giles
J.

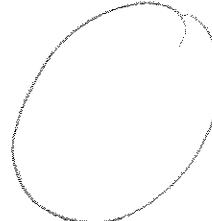
EXHIBIT G

Case 2:07-cv-04637-JG Document 15 Filed 06/03/2008 Page 1 of 1
Case 2:07-cv-04637-JG Document 10 Filed 04/23/2008 Page 1 of 4

JF

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RYAN SILLS,



Plaintiff,

Civil Action No. 07-4637

v.

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES.

FILED

Defendant.

MICHAEL C. RUIZ, Clerk
By Dep. Clerk

ORDER

AND NOW, this 2nd day of June, 2008, that upon consideration of Plaintiff's Counsel's Petition to Withdraw their Appearance and any response thereto, it is hereby ORDERED and DECREED the Petition is GRANTED, and the Firm of Karpf, Karpf & Virant and attorneys Ari Karpf and Sean Galvin are no longer counsel for Plaintiff.

It is further ORDERED that the above-captioned matter is stayed for a period of ~~sixty~~
~~30~~ (60) days to permit Plaintiff to find new counsel if he wishes to proceed with his case. The trial date of 12/3/08 remains firm.
BY THE COURT

The Honorable James T. Giles, U.S.D.J.

ENTERED

CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RYAN SILLS, : CIVIL ACTION
: NO. 07-4637
Plaintiff, :
: v.
: EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES, :
: Defendants. :

ORDER

AND NOW, this 2nd day of June, 2008, the court having granted the Petition of Ari Karpf and the firm of Karpf, Karpf & Virant for Leave to Withdraw as Legal Counsel, it is hereby ORDERED as follows:

1. All previously scheduled dates in the above-captioned matter are STAYED for a period of 30 days, except that the trial and final pretrial conference dates are unchanged.
2. If, for good cause, Plaintiff files a motion to extend the discovery deadline, the court will consider expanding the date to a date not later than August 31, 2008.
3. Plaintiff will be deemed pro se if he fails to obtain an attorney within thirty (30) days.
4. Attorney Jeremy Cerutti of the law firm Karpf, Karpf & Virant, shall send to Plaintiff via regular and certified mail a copy of (1) the instant Order and (2) the court's Order granting the Petition of Ari Karpf and the firm of Karpf, Karpf & Virant for Leave to Withdraw as Legal Counsel.

5. The court shall take under advisement Defendant's Oral Motion to Dismiss for Lack of Prosecution, as made on the record on this date.

BY THE COURT:

S/ James T. Giles
J.